



MJ Simon and Company
1331 G Street, NW
Suite 910
Washington, DC 20005
www.mjsimonandcompany.com

July 20th, 2016

The Honorable Sylvia Mathews Burwell, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW Washington, DC 20201

Re: Iowa Health and Wellness Plan: NEMT Waiver

Dear Secretary Burwell:

Simon&Co., a health policy firm, opposes extension of the non-emergency medical transportation (NEMT) waiver because our research and that of the University of Iowa support the need for this long-standing, mandatory benefit for Iowa's Medicaid expansion population.

According to the state's own evaluation by the University of Iowa,, beneficiaries enrolled in Iowa's Wellness Plan (WP) report higher rates of functional limitation, multiple physician health problems, poorer physical health and poorer mental health when compared to Medicaid State Plan (MSP) members. Further, these chronically ill individuals report higher rates of unmet need for NEMT ranging from 37% more likely for individuals with poor mental health to 145% more likely for individuals with a functional limitation. Finally, individuals reporting an unmet need for NEMT (the chronically ill) that also lack the NEMT benefit (WP members) were significantly (~40%) less likely to have had a well care visit according to administrative data.

These findings reiterate the findings of our analysis of data from the largest, Medicaid NEMT manager for the Community Transportation Association of America (Medicaid Expansion and Premium Assistance: The Importance of Non-Emergency Medical Transportation to Coordinated Care for Chronically Ill Patients). This study found a growing need for transportation as a key component of healthcare plans for the chronically ill.

Additionally, new data also acquired by Simon&Co. from the nation's largest NEMT broker further confirms the link between health status and NEMT utilization. In two states with diverse Medicaid populations and programs that chose to expand Medicaid, data shows that, in one state, through May 2016, mental health services and substance abuse treatment account for nearly half of NEMT rides for both the traditional and Medicaid expansion populations. Findings from another state show that, also through May, the expansion population utilizes NEMT services for mental health services at higher rates than the traditional Medicaid population.

Thus, we urge CMS to finally deny Iowa's request to eliminate NEMT for the expansion population. Thank you for the opportunity to comment on the NEMT waiver to the Iowa Health and Wellness Plan. If you have any questions please have your staff contact me at msimon@mjsimonandcompany.com or 202-204-4707.

Sincerely,

Marsha J. Simon
President, MJ Simon and Company

CC: Eliot Fishman, Director, State Demonstrations Group